

B. Status Update for the Court

For the Court's information, on May 3, 2023, attorneys for the SEC, the FBI, and the Receiver (the "Agents") visited: (1) CETA's locations in Fairfield, Texas and Hill's home; (2) Shelly's home and dental office in West Chester, PA; and (3) Shelly's home in Ocala, Florida. The Receiver took possession of the office locations in Fairfield and Shelly's PA home. The banks were notified and effected the freeze orders. Presently, at least \$50 million has been frozen. We have learned of many more accounts as well, in addition to brokerage accounts.

A quick review of CETA's books and records confirmed what the bank records already revealed, which is that CETA has virtually no revenue from sales or operations. No employee could answer the question of how CETA makes money, other than by investor deposits.

Hill was not present at the Fairfield office. Multiple employees provided Hill's address (181 E. Hwy 84, Fairfield) and property gate code, where he lives with his ex-wife/current girlfriend, Edwina Hill ("Ms. Hill"). The Agents, including the undersigned attorney, met with Hill and Ms. Hill in person at their residence. Hill refused the Receiver access to the home, claiming that because it was legally in Ms. Hill's name, the Receiver could not enter the premises. Hill denied that he lived there, telling the Agents that he lived at CETA's main office, in a conference room (with no personal effects or bed) that the employees refer to as "the Boardroom."

Agents met with Shelly in person at his home in Ocala, FL, and the Receiver took possession of his residence in PA. Between his homes in PA and FL, the Receiver recovered significant amounts of gold coins and bullion.

The SEC is pursuing expedited discovery.

WHEREFORE, the SEC respectfully requests that the Clerk unseal the proceedings.

Dated: May 4, 2023.

Respectfully submitted,

s/ Jennifer D. Reece

Jennifer D. Reece

Texas Bar No. 00796242

Direct phone: (817) 978-6442

reecej@sec.gov

Jason J. Rose

Texas Bar No. 24007946

Direct phone: (817) 978-1408

rosej@sec.gov

United States Securities and Exchange Commission

Burnett Plaza, Suite 1900

801 Cherry Street, Unit 18

Fort Worth, Texas 76102

ATTORNEYS FOR PLAINTIFF

SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF SERVICE

I certify that on May 4, 2023, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Western District of Texas, Waco Division using the electronic case filing system of the court. I hereby certify that I have served a copy of this document on all parties in accordance with FED. R. CIV. PRO. 5(b)(2).

/s/ Jennifer D. Reece

Jennifer D. Reece